

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS (BOSTON)

DENNIS DIMON

v.

MICHAEL B. LATTI,  
LATTI ASSOCIATES,  
LATTI & ANDERSON LLP,  
METROPOLITAN LIFE INSURANCE COMPANY,  
KEMPER INSURANCE COMPANY, and  
MORGAN STANLEY DW, INC.

C.A. No. 05-11073

**MOTION TO ADMIT TIMOTHY J. O'DRISCOLL, ESQ. AND THE LAW FIRM OF  
DRINKER BIDDLE & REATH LLP PRO HAC VICE**

I, Matthew C. Welnicki, pursuant to Local Rule 83.5.3 move that Timothy J. O'Driscoll, Esq. and his law firm, Drinker Biddle & Reath LLP, be admitted as a member of the bar of this Court *pro hac vice* for the purpose of representing Kemper Insurance Company in this action. In support of this Motion, I have attached hereto the Certification of Timothy J. O'Driscoll, Esq. certifying that (1) he is a member of the bar in good standing of every jurisdiction where he has been admitted to practice, (2) that there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction, and (3) that he is familiar with the Rules of this Court as well as the Massachusetts Rules of Professional Conduct.

WHEREFORE, I respectfully request that this Court admit Timothy J. O'Driscoll and his law firm, Drinker Biddle & Reath LLP, *pro hac vice*.

Respectfully submitted,

s/Matthew C. Welnicki/

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Matthew C. Welnicki (BBO# 647104)  
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Philadelphia, PA 19103  
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Attorneys for Defendant,  
Kemper Insurance Company

Dated: July 15, 2005

**Certificate of Service**

I hereby certify that I caused a copy of the above document to be served on counsel of record via this Court's Electronic Filing System and by first-class mail this 15<sup>th</sup> day of July, 2005.

s/Matthew C. Welnicki/

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**CERTIFICATION OF TIMOTHY J. O'DRISCOLL, ESQ.**

I, Timothy J. O'Driscoll, Esq., hereby certify and state as follows:

1. I submit this Certification in support of Matthew C. Welnicki's Motion To Admit Timothy J. O'Driscoll, Esq. *Pro Hac Vice*.

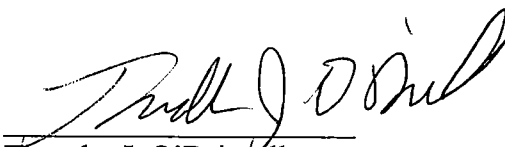
2. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice.

3. There are no disciplinary proceedings pending against me as a member of the bar of any jurisdiction.

4. I have received a copy of, and I am now familiar with and will faithfully abide by, the Local Rules of the United States District Court for the District of Massachusetts as well as the Massachusetts Rules of Professional Conduct.

5. I represent Kemper Insurance Company in an action filed in the Federal District Court for the District of Massachusetts, titled *Dennis Dimon v. Micahel B. Latti, et al.*, Civ. No. 05-11073. I am now seeking admission *pro hac vice* so that I may represent Kemper Insurance Company in connection with this matter.

Signed under the penalties of perjury this 15 day of July 2005.

  
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Timothy J. O'Driscoll